



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 23, 2025

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Riverkeeper, Inc. v. Zeldin*, No. 17 Civ. 4916 (VSB)


Dear Judge Broderick:

On behalf of defendants U.S. Environmental Protection Agency (“EPA”) and Lee Zeldin, in his official capacity as Administrator of the EPA<sup>1</sup> (jointly, “defendants”), I write to respectfully request limited extensions of the April 25, 2025 deadline for the parties to submit a joint status report and the April 30, 2025 abeyance period (ECF No. 208). Under defendants’ proposed deadlines, the joint status report will be due on **May 7, 2025**, and the abeyance period will expire on **May 14, 2025**. The limited extensions are requested because defendants need more time to brief senior EPA officials regarding the current status of this case and to also consider language proposed by plaintiffs’ counsel on April 21 for inclusion in the parties’ next joint status report. Counsel for all parties consent to this request.

We thank the Court for its consideration of this request.

Respectfully,

JAY CLAYTON  
United States Attorney

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 4/25/2025

/s/ Tomoko Onozawa  
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cc (via ECF): All counsel of record

<sup>1</sup> EPA Administrator Lee Zeldin is automatically substituted for defendant Michael S. Regan in this action, by operation of Fed. R. Civ. P. 25(d).